
**MODIFICATIONS TO WATER QUALITY ORDER NO. 2004-0009-DWQ
NPDES NO. CAG990005**

**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT FOR THE
DISCHARGE OF AQUATIC PESTICIDES FOR AQUATIC WEED CONTROL IN
WATERS OF THE UNITED STATES (WEED CONTROL PERMIT)**

For reference, we have included the following changes in an accompanying sample order.

1. In the Fact Sheet on page 6 following the third full paragraph, add the following:

Finding 31 of this Order states that it may be reopened to add coverage of aquatic pesticides that have been newly registered by DPR. On September 2, 2005, DPR registered imazapyr for aquatic application.

Imazapyr is a herbicide used to control floating and emergent aquatic vegetation, including shoreline grass, broadleaf weeds, brush species, and perennials. It does not control submerged or mostly submerged foliage. Imazapyr is a slow-acting amino acid synthesis inhibitor. It has an average water half-life of four days with photodegradation as the primary form of degradation in water.

Imazapyr acts quicker and is less toxic than other low-volume herbicides. According to the San Francisco Estuary Invasive Spartina Project's May 4, 2005 report titled *Use of Imazapyr Herbicide to Control Invasive Cordgrass (Spartina spp.) in the San Francisco Estuary*, imazapyr in water rapidly degrades via photolysis. The report further states that a number of field studies demonstrated that imazapyr rapidly dissipated from water within several days, no detectable residues of imazapyr were found in either water or sediment within two months; and in estuarine systems, dilution of imazapyr with the incoming tides contributes to its rapid dissipation suggesting that imazapyr is not environmentally persistent in the estuarine environment and does not result in significant impacts to water quality. The report concludes that imazapyr herbicides can be a safe, highly effective treatment for control and eradication of non-native *Spartina* species in the San Francisco Estuary and offers an improved risk scenario over the existing treatment regime with glyphosate herbicides.

2. On page 6 of the Fact Sheet in the fourth paragraph, second sentence, under the heading Permit Coverage/Notification Requirements, add the word "imazapyr" immediately following glyphosate.
3. On page 6 of the Fact Sheet in the bottom paragraph, seventh sentence, under the heading Permit Coverage/Notification Requirements, add the word "imazapyr" immediately following glyphosate.

4. On page 14 of the Fact Sheet under the heading Receiving Water Limitations and after the third full paragraph, insert the following:

Imazapyr

Currently, there are no State or USEPA-based numeric objectives or criteria for imazapyr. Therefore, this General Permit does not have receiving water limitations for imazapyr. However, it requires dischargers who use imazapyr to monitor their applications.

5. On page 2 of the Waste Discharge Requirements, add the new Finding 13 below and renumber subsequent Findings.
 13. On September 2, 2005, the California Department of Pesticide Regulation (DPR) registered imazapyr for aquatic application. On September 7, 2005, this General Permit was modified to allow the discharge of pollutants associated with the application of imazapyr-based aquatic pesticides to surface waters for aquatic weed control.
6. Due to the addition of a Finding, all proceeding Findings, found on pages 2 through 6, will be renumbered.
7. In the Waste Discharge Requirements under heading A. Application Requirements on page 6, insert the word “imazapyr” immediately after glyphosate.
8. On page 2 of Attachment E under the heading Public Entities with Policy Section 5.3 Exception, add “Santa Cruz Water Department” as number 19 and renumber those that follow.